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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

UNITED STATES OF AMERICA,

Plaintiff,

v.

WILLIAM JOHN LEE, et al.,

Defendants.

Case No. 18-CR-108-S

**UNITED STATES' MOTION FOR
EXTENSION OF TIME TO DISCLOSE DISCOVERY**

COMES NOW the United States of America, by and through its attorney, Trevor J. Schenk, Special Assistant United States Attorney for the District of Wyoming, and respectfully moves the Court for an order extending Rule 16 discovery deadline to Defendants in this matter. As grounds for this Motion, the United States asserts:

1. The Defendants were indicted on July 19, 2018.
2. The charges arise from evidence derived from an extensive multi-agency investigation. Said evidence includes voluminous documents, photos, videos, as well as a multitude of intercepted telephone calls, text messages; law enforcement reports; and seizure of items from numerous search warrants.
3. The United States is compiling the extraordinarily large amount of investigative materials in an electronic format, which will help defense counsel to organize, search and efficiently store the information.

4. Due to the volume and nature of the evidence compiled during the investigation, the government needs extra time to provide discovery to the Defendants.

5. The Defendants, William Lee, Phillip McGuire and Howard Shull had their arraignments: July 30, 2018, and Brian Bland had his arraignment on August 8, 2018. A discovery order (ECF Doc. 35) was entered on July 30, 2018, for Phillip McGuire requiring the government to produce discovery in twenty days from the date of the discovery order making discovery due on August 17, 2018. William Lee and Howard Shull's discovery order (ECF Doc. 42) was entered on July 31, 2018, requiring the government to produce discovery within fourteen days of the discovery order making discovery due for these two defendants on August 14, 2018. Brian Bland's discovery order (ECF Doc. 53) was entered on August 8, 2018, requiring the government to produce discovery within fourteen days making discovery due on August 22, 2018.

6. On August 7, 2018, the United States filed a request for a status conference (ECF Doc. 49) to discuss unified discovery and motion deadlines. Therefore, the United States would request an extension of time to provide discovery to the Defendants in this matter until discovery, scheduling and related motions are addressed by the Court.

DATED this 9th day of August, 2018.

Respectfully submitted,

MARK A. KLAASSEN
United States Attorney

By: /s/ Trevor J. Schenk
TREVOR J. SCHENK
Special Assistant United States Attorney

CERTIFICATE OF SERVICE

This is to certify that on this 9th day of August, 2018, I served true and correct copies of the foregoing **United States Motion for Extension of Time to Disclose Discovery** upon all counsel via CM/ECF.

/s/ *Lisa Wait*

UNITED STATES ATTORNEY'S OFFICE